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SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR AND
KANWAR CHADHA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAMMY ESSES, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR and
KANWAR CHADHA,

Defendants.

No. 08 CV 00856 MMC

STIPULATION AND ~~PROPOSED~~
CONSOLIDATION ORDER

BRIAN J. MAJUR, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR and
KANWAR CHADHA,

Defendants.

No. 08 CV 01013 MMC

1 ALAN NUSSBAUM, On Behalf of Himself)
2 and All Others Similarly Situated,)

3 Plaintiff,)
4)

5 vs.)

6 SiRF TECHNOLOGY HOLDINGS, INC.,)
7 DIOSDADO P. BANATAO, MICHAEL L.)
8 CANNING, KANWAR CHADHA and)
9 GEOFFREY RIBAR,)

10 Defendants.)
11)

No. 08 CV 00905 JSW

12 GARY MITCHELL SCHORR REV. TRUST)
13 U/A DTD 3-20-98, Individually and on)
14 Behalf of All Others Similarly Situated,)

15 Plaintiff,)
16)

17 vs.)

18 SiRF TECHNOLOGY HOLDINGS, INC.,)
19 DIOSDADO P. BANATAO, MICHAEL L.)
20 CANNING, GEOFFREY RIBAR and)
21 KANWAR CHADHA)

22 Defendants.)
23)

No. 08 CV 01121 MMC

24 SIDNEY FIELDEN, AS TRUSTEE ON)
25 BEHALF OF THE SIDNEY AND)
26 MILDRED FIELDEN JOINT REVOCABLE)
27 TRUST on behalf of itself and all others)
28 similarly situated,)

Plaintiff,)
vs.)

SiRF TECHNOLOGY HOLDINGS, INC.,)
DIOSDADO P. BANATAO, MICHAEL L.)
CANNING, KANWAR CHADHA and)
GEOFFREY RIBAR,)

Defendants.)
)

No. 08 CV 01104 MHP

1 JAMES FURMAN, Individually And On
2 Behalf of All Others Similarly Situated,

3 Plaintiff,

4 vs.

5 SiRF TECHNOLOGY HOLDINGS, INC.,
6 MICHAEL L. CANNING, DIOSDADO P.
7 BANATAO, KANWAR CHADHA and
8 GEOFFREY RIBAR,

9 Defendants.

No. 08 CV 01122 WHA

10 RODNEY HUNTER, Individually And On
11 Behalf of All Others Similarly Situated,

12 Plaintiff,

13 vs.

14 SiRF TECHNOLOGY HOLDINGS, INC.,
15 MICHAEL L. CANNING, DIOSDADO P.
16 BANATAO, GEOFFREY RIBAR and
17 KANWAR CHADHA,

18 Defendants.

No. 08 CV 01210 SC

19 The parties hereby stipulate, and the Court hereby orders, as follows:

20 **CONSOLIDATION OF RELATED CASES**

21 1. The above-captioned actions are related cases within the meaning of Civil L.R. 3-12.
22 Pursuant to FRCiv P. 42(a), these cases are hereby consolidated into Civil Action No. C08-00856 for
23 pretrial proceedings before this Court. The consolidated action shall be captioned: "*In re SiRF*
Technology Holdings, Inc. Securities Litigation."

24 2. Counsel for Defendants hereby accept service of all complaints and summonses in the
25 above-captioned matters pursuant to Federal Rule of Civil Procedure 4(d).

26 3. All related actions that are subsequently filed in, or transferred to, this District shall
27 be consolidated into this action for pretrial purposes. This Order shall apply to every such related
28

1 action, absent order of the Court. A party that objects to such consolidation, or to any other
2 provision of this Order, must file an application for relief from this Order within thirty (30) days
3 after the date on which a copy of this Order is served on the party's counsel.

4 4. This Order is entered without prejudice to the rights of any party to apply for
5 severance of any claim or action, for good cause shown.

6 **MASTER DOCKET AND CAPTION**

7 5. The docket in Civil Action No. C-08-00856 shall constitute the Master Docket for
8 this action.

9 6. Every pleading filed in the consolidated action shall bear the following caption:

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 In re SiRF TECHNOLOGY HOLDINGS, INC.)
13 SECURITIES LITIGATION)

Master File No.
C 08 00856

14)
15) CLASS ACTION
16)
17)

15 This Document Related To:
16
17

18 7. The file in Civil Action No. C08 00856 shall constitute a Master File for every action
19 in the consolidated action. When the document being filed pertains to all actions, the phrase "All
20 Actions" shall appear immediately after the phrase "This Document Relates To:". When a pleading
21 applies only to some, not all, of the actions, the documents shall list, immediately after the phrase
22 "This Document Relates To:", the docket number of each individual action to which the document
23 applies, along with the last name of the first-listed plaintiff in said action (e.g., "No. C-08-00856
24 (Esses))."

25 8. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12 whenever
26 a case that should be consolidated into this action is filed in, or transferred to, this District. If the
27 Court determines that the case is related, the clerk shall:

28 (a) place a copy of this Order in the separate file for such action;

- (b) serve on plaintiff's counsel in the new case a copy of this Order;
- (c) direct that this Order be served upon defendants in the new case; and
- (d) make the appropriate entry in the Master Docket.

LEAD PLAINTIFF'S COUNSEL

9. After the Court has designated a Lead Plaintiff and Lead Plaintiff's Counsel, pursuant to 15 U.S.C. § 78u-4(a)(3), Lead Plaintiff's Counsel shall have authority to speak for, and enter into agreements on behalf of, plaintiffs in all matters regarding pretrial procedures, discovery, and settlement negotiations. Lead Plaintiff's Counsel shall be responsible for coordination of all activities and appearances on behalf of plaintiffs and for dissemination of notices and orders. Lead Plaintiff's Counsel shall be responsible for communications with the Court on behalf of all plaintiffs. Lead Plaintiff's Counsel shall maintain a master service list of all parties and counsel, and service upon Lead Plaintiff's Counsel shall be deemed sufficient to effect service on all plaintiffs.

10. Defendants' counsel may rely upon agreements made with Lead Plaintiff's Counsel. Such agreements shall be binding on all plaintiffs.

PLEADINGS AND MOTIONS

11. Following the appointment of a Lead Plaintiff and Lead Plaintiff's Counsel, the parties shall meet and confer and submit a mutually agreeable schedule for the filing of a consolidated complaint (or designation of an operative complaint), as well as for the briefing and hearing of responses thereto. The consolidated or operative complaint shall supersede all complaints filed in any of the actions consolidated herein.

12. Defendants are not required to respond to the complaint in any action consolidated into this action, other than a consolidated complaint filed by the Lead Plaintiff or a complaint designated as the operative complaint by the Lead Plaintiff.

13. The above-captioned cases have been designated for this Court's Electronic Case Filing Program, and all pleadings and papers shall be electronically served in accordance with the Local Rules and General Orders of this Court regarding Electronic Case Filing. To the extent that any papers are not electronically filed, the Defendants and the Lead Plaintiff shall serve all such papers on each other by hand, by overnight delivery, or facsimile, unless otherwise agreed upon.

1 Notwithstanding the foregoing, and paragraph 9 above, in the event that Defendants elect to serve
2 plaintiffs' counsel other than Lead Plaintiff's Counsel, they may do so by first-class mail, unless
3 otherwise agreed upon by the parties.

4 Dated: March 13, 2008.

5 PILLSBURY WINTHROP SHAW PITTMAN LLP
6 DAVID M. FURBUSH
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8 By /s/ David M. Furbush

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10 Attorneys for Defendants
SIRF TECHNOLOGY HOLDINGS, INC.,
11 MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR AND KANWAR
12 CHADHA

13 Dated: March 13, 2008.

14 COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP
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17 By /s/ Shawn A. Williams

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19 Attorneys for Plaintiff
SAMMY ESSES, Individually and On Behalf of
20 All Others Similarly Situated

21 Dated: March 13, 2008.

22 GLANCY BINKOW & GOLDBERG LLP
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25 By /s/ Michael Goldberg

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28 Similarly Situated

1 Dated: March 13, 2008.

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13 Others Similarly Situated

14 Dated: March 13, 2008.

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25 All Others Similarly Situated

26 Dated: March 13, 2008.

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By /s/ Betsy C. Manifold

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SIDNEY FIELDEN, AS TRUSTEE ON BEHALF
OF THE SIDNEY AND MILDRED FIELDEN
JOINT REVOCABLE TRUST on behalf of itself
and all others similarly situated

1 Dated: March 13, 2008.

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3 JONATHAN K. LEVINE
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8 By /s/ Arron M. Sheanin

9 Attorneys for Plaintiff
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11 Of All Others Similarly Situated

12 Dated: March 13, 2008.

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18 By /s/ Alan R. Plutzik

19 Attorneys for Plaintiff
20 RODNEY HUNTER, Individually and On Behalf
21 Of All Others Similarly Situated


22 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
23 “conformed” signature (/s/) within this efiled document.

24 /s/ David M. Furbush

25 **ORDER**

26 PURSUANT TO STIPULATION, IT IS **SO ORDERED**.

27 DATED: March 14, 2008

28 
Hon. Maxine M. Chesney
United States District Judge